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December 5, 1997

Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

Re: No. CCD 92-237; In the Matter of Administration of the North American
Numbering Plan, Carrier Identification Codes (CIC's)

Enclosed for filing in the above captioned matter are an original and four
(4) copies of a Petition of Haxtun Telephone Company for Waiver of the January
1, 1998 Implementation Date for 4-Digit CIC. We trust that the enclosed will be
found in order for filing and grant.

Should you require any further information, or have any questions
regarding this filing, please call my office directly at (719) 594-5800.

Sincerely,



Bob Schoonmaker
Vice-President

Enclosures

cc: Service List



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Before the
Federal Communications Commission
Washington, D.C. 20554

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DEC 8 1997

FCC MAIL ROOM

In the Matter of)

Administration of the)

North American Numbering Plan,)

Carrier Identification Codes (CICs))

CC Docket No. 92-237

PETITION OF HAXTUN TELEPHONE COMPANY
FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

GVNW, Inc.
2270 La Montana Way
Colorado Springs, Colorado 80918

Date Submitted: December 8, 1997

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PETITION OF HAXTUN TELEPHONE COMPANY
FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION
DATE FOR 4-DIGIT CIC

I. Introduction

Haxtun Telephone Company, (hereafter "Haxtun") by its consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby requests a temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

Paragraph 20 of the Order reads, "First, we determine that LEC end office switches must be upgraded to accept four-digit CICs by January 1, 1998. Second, we

determine that the transition during which use of both three-digit CICs and five-digit CACs may continue will end on June 30, 1998, rather than on January 1, 1998."

Further, paragraph 24 states, "If we receive a complaint of LEC noncompliance, infeasibility with that deadline will not relieve a defendant LEC of liability under section 208 of the Commission's rules. A LEC that determines that it will not meet the January 1, 1998 conversion deadline must seek relief from the Commission prior to that date."

In compliance with the FCC's Order on Reconsideration, specifically at paragraph 24, Haxtun is seeking relief of the FCC's conversion deadline of January 1, 1998, by this request for wavier. Haxtun will identify special circumstances that warrant a deviation from the Order and that a wavier will serve the public interest. Also, Haxtun will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

II. Background

Haxtun became aware of the requirement to upgrade or change its current software generic to accommodate four-digit CIC and seven-digit CAC shortly after the FCC released its April 1997 Order. Upon learning of the Order and the deadline, Haxtun contacted Stromberg-Carlson to discuss network configuration options that would satisfy the FCC CIC/CAC requirements, at the same time provide additional and enhanced functions and features. Stromberg-Carlson did not respond in a timely manner and when it responded the price quotes were not acceptable. Haxtun turned to Nortel as an alternative. Based on Nortel's recommendation, Haxtun is moving forward with a

host/remote network configuration. The Haxtun switch will serve as the host with Fleming and Crook serving as remotes off Haxtun.

Haxtun is using a Nortel equipment reseller to secure the appropriate equipment to complete the network. Equipment has been ordered and is currently in the process of being shipped. Haxtun will begin the installation of the switches immediately upon delivery. It is Haxtun's intent to have the network operational on or before June 30, 1998.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

Haxtun serves three exchanges for a total of 1874 access lines. The following provides information pertaining to the quantity of access lines by exchange:

Exchange Name	# of Access Lines	# of Payphones	# of Hotels, Motels
Haxtun	1167	9	0
Fleming	468	2	0
Crook	239	7	0
TOTAL	1874	18	0

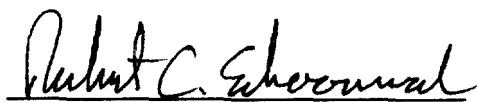
Each of the exchanges is served by a Stromberg-Carlson DCO with the software generic 17-B. As discussed above, Haxtun is replacing the current architecture with a Nortel host/remote architecture. The total estimated cost of the switch replacement for all offices is \$278,645. Exchange level detail is described in the following table:

Exchange Name	Switch Vendor & Type	Generic	Cost
Haxtun	Nortel DMS 10	406.10	\$146,075
Fleming	Nortel DMS 10 RSLE	406.10	\$64,250
Crook	Nortel DMS 10 RSLE	406.10	\$68,320

Haxtun has taken immediate action to begin the process of achieving compliance with the Commission's requirements upon learning of the FCC's requirements and deadline. Haxtun will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline.

IV. Conclusion

As demonstrated, the company has taken immediate action to remedy its situation in order to meet with the FCC's timing requirements. Grant of the instant petition will serve the public interest and will allow Haxtun to complete its network upgrades by the FCC's required effective date for the permissive period. Haxtun submits that the public interest will be better served by a waiver of the December 31, 1997 date and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, Haxtun Telephone Company respectfully requests the Commission grant the petition.



Robert C. Schoonmaker
Vice President, GVNW Inc./Management

12/5/97
Date

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